EXHIBIT A

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| 1 | DENNIS J. HERRERA, State Bar #139669 City Attorney | | | | | |
|----|--|--|--|--|--|--|
| 2 | RONALD P. FLYNN, State Bar # 184186 | | | | | |
| 3 | Chief Deputy City Attorney YVONNE R. MERE, State Bar # 173594 | | | | | |
| 4 | Chief of Complex & Affirmative Litigation OWEN J. CLEMENTS, State Bar # 141805 | | | | | |
| 5 | SARA J. EISENBERG, State Bar # 269303 JAIME M. HULING DELAYE, State Bar # 270784 | | | | | |
| 6 | Deputy City Attorneys Fox Plaza | | | | | |
| 7 | 1390 Market Street, Sixth Floor San Francisco, CA 94102 | | | | | |
| 8 | Telephone: 415/554-3957 415/437-4644 (fax) | | | | | |
| 9 | jaime.hulingdelaye@sfcityatty.org | | | | | |
| 10 | Attorneys for The People of the State of California, acting by and through San Francisco City Attorney | | | | | |
| | Dennis J. Herrera | | | | | |
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| 13 | UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA | | | | | |
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| 16 | THE CITY AND COUNTY OF SAN | Case No. 3:18-cv-7591-CRB | | | | |
| 17 | FRANCISCO, CALIFORNIA and THE PEOPLE OF THE STATE OF CALIFORNIA, Acting by | DECLARATION OF JONATHAN | | | | |
| 18 | and through San Francisco City Attorney DENNIS J. HERRERA, | JAFFE IN SUPPORT OF THE PLAINTIFF'S FURTHER MOTION | | | | |
| 19 | Plaintiffs, | TO COMPEL WALGREENS' DUE DILIGENCE NOTES | | | | |
| 20 | V. | | | | | |
| 21 | PURDUE PHARMA L.P., et al. | | | | | |
| 22 | Defendants. | | | | | |
| 23 | | | | | | |
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| 1 | | I, Jonathan Jaffe, hereby declare and state: |
|----|---------|--|
| 2 | | |
| 3 | 1. | I make this declaration upon personal knowledge and could and would competently testify |
| 4 | | to the matters below if called to do so. |
| 5 | 2. | I am a technology consultant and founder and owner of Its-Your-Internet, an advanced |
| 6 | | technology software and general litigation support consulting firm, established in 2008. I |
| 7 | | have been retained by the Plaintiffs' attorneys here and in the MDL to provide technology |
| 8 | | consulting services with regard to electronic discovery and related issues in this litigation. |
| 9 | 3. | I have consulted in other litigations on HIPAA issues, and have fashioned queries to |
| 10 | | produce large quantities of prescription data with redactions to protected health |
| 11 | | information ("PHI"). |
| 12 | 4. | This declaration is submitted based upon my knowledge, experience, and information |
| 13 | | provided to me with regard to the electronic discovery issues in this litigation. A copy of |
| 14 | | my current curriculum vitae is attached hereto as Attachment A . ¹ |
| 15 | 5. | I was present for the three video-conference meet-and-confer sessions held on May 18 and |
| 16 | | May 19, 2021. |
| 17 | 6. | I have reviewed Walgreens' subsequent further communications to Plaintiff's counsel |
| 18 | | regarding the nature of their electronic notes fields. |
| 19 | 7. | I am generally familiar with Walgreens' software systems, having been present in the |
| 20 | | "data" 30(b)(6) Walgreens' deposition in Case Track 3 in MDL2804 and having read |
| 21 | | Walgreens' further written responses to data questions in that same case. |
| 22 | 8. | On May 18th, Walgreens showed Plaintiffs and me two discrete sets of notes data from |
| 23 | | Walgreens' electronic dispensing records. |
| 24 | 9. | The first set ("San Francisco Patient Comments") contained 1000 distinct unredacted |
| 25 | | ("raw") Patient Comments from prescriptions produced in this litigation collected from |
| 26 | | San Francisco Walgreens stores. |
| 27 | 1 1 440 | chment A – Jonathan Jaffe CV. This document includes all publications that I have |
| 28 | author | ed in the past ten years and all cases in which I have testified as an expert at trial or by |

deposition.

DECLARATION OF JONATHAN JAFFE RE MOTION TO COMPEL WALGREENS' DUE DILIGENCE NOTES

| 1 | 20. The PHI that I observed in the Ohio Rx Annotations included addresses, names, dates of | | |
|----|---|--|--|
| 2 | birth, and phone numbers. | | |
| 3 | 21. Based upon my professional experience, using standard pattern matching techniques, such | | |
| 4 | as regular expressions and comparisons to Walgreens' own dispensing fields (e.g. patient | | |
| 5 | name, date of birth, phone), Walgreens could automatically redact more than 90% of the | | |
| 6 | PHI I observed with a specific notation to indicate the type of PHI that was redacted, e.g. | | |
| 7 | email, patient address, patient name, patient DOB, patient phone number, etc. | | |
| 8 | 22. "Regular expressions" and "pattern matching" are standard data techniques that could be | | |
| 9 | applied to automatically find and replace PHI as such: | | |
| 10 | a. Patient Name - | | |
| 11 | a simple, automated case-insensitive comparison of the patient's first and last | | |
| 12 | names individually with the text in the field, substituting [AUTO REDACTED | | |
| 13 | PHI: PATIENT NAME] for the text | | |
| 14 | b. Date of Birth - | | |
| 15 | it should be sufficient to match for the year of the patient's birth and/or remove all | | |
| 16 | dates predating the date of the prescription by five years, substituting [AUTO | | |
| 17 | REDACTED PHI: POSSIBLE DOB] for the text | | |
| 18 | c. Social Security Number - | | |
| 19 | match all nine digit numbers of the form, xxx-xx-xxxx or xxx.xxxx or | | |
| 20 | xxxxxxxxx, substituting [AUTO REDACTED PHI: POSSIBLE SSN] | | |
| 21 | (I did not observe any SSNs in the San Francisco Patient Comments nor in the | | |
| 22 | Ohio Rx Annotations.) | | |
| 23 | d. Address - | | |
| 24 | street addresses I observed were in standard form (line 1, line 2 [optional], city, | | |
| 25 | state, zip) and patient addresses could be exactly matched, substituting in [AUTO | | |
| 26 | REDACTED PHI: ADDRESS] and [AUTO REDACTED PHI: PATIENT | | |
| 27 | ADDRESS] for the text | | |
| 28 | | | |

| 1 | e. Phone Number - | |
|----|---|----|
| 2 | phone numbers are 10 or 11 digits (sometimes 7 if without area code) containing | a |
| 3 | predictable pattern of +() such that they can be matched, particularly if they | |
| 4 | contain the digits of patient's principal phone number, substituting in [AUTO | |
| 5 | REDACTED PHI: PHONE] and [AUTO REDACTED PHI: PATIENT PHONE] |] |
| 6 | for the text | |
| 7 | f. Email - | |
| 8 | if a patient's email address is otherwise known to Walgreens through other | |
| 9 | dispensing data fields, it can be redacted in its entirety, while unknown email | |
| 10 | addresses can be recognized by the generalized pattern of xxxx@yyy.abc ; most | |
| 11 | email addresses I observed were in a standard form with common endings (e.g. | |
| 12 | .com, .edu, .net, .org, etc.) such that they could be readily identified through a | |
| 13 | regular expression, substituting in [AUTO REDACTED PHI: EMAIL] and | |
| 14 | [AUTO REDACTED PHI: PATIENT EMAIL] for the text | |
| 15 | g. Medical Record Identifier - | |
| 16 | any medical record identifiers known to Walgreens can be replaced through direct | et |
| 17 | replacement, and any common format patterns for medical record identifiers | |
| 18 | commonly entered in by Walgreens could be matched through a regular | |
| 19 | expression, substituting in [AUTO REDACTED PHI: MEDICAL RECORD | |
| 20 | IDENTIFIER] for the text | |
| 21 | (I did not observe any text that appeared to be a Medical Record Identifier in the | ? |
| 22 | San Francisco Patient Comments nor in the Ohio Rx Annotations.) | |
| 23 | 23. Walgreens can further refine the above suggestions by examining samples of their own | |
| 24 | data to identify PHI various common patterns of presentation. | |
| 25 | 24. Indeed, Walgreens should make efforts to identify the exact types of PHI actually preser | ıt |
| 26 | in quantity in their data. For example, in the San Francisco Patient Comments, the only | |
| 27 | PHI I observed that were of significant quantity were email addresses; thus, Walgreens | |
| 28 | would not have to automatically redact any type of PHI in the San Francisco Patient | |
| | | |

25. Since Walgreens would retain the unredacted text, both Plaintiffs and Walgreens would retain the ability to ask for a manual re-review of the automated redaction applied to any given note. For this reason, I recommend that Walgreens retain an indication in the

redaction that it was applied automatically.

Comments other than email addresses.

26. In my professional opinion, after such an automatic redaction, to validate accuracy, Walgreens would take a statistically valid random sample to compare what was redacted to the unredacted original and confirm the redaction was neither over nor under inclusive, adjusting accordingly.

27. In my experience, such automated redaction can be accomplished with free tools and minimal software code. I understand that counsel for Plaintiff has offered to put me in touch with Walgreens' technical staff. I remain available to facilitate.

28. In summary, the automated redaction process I have described would eliminate the vast majority of PHI I observed in Walgreens' electronic notes fields.

29. I understand that Walgreens' counsel has represented to Plaintiff that, regardless of whether Walgreens employs automatic redaction, it still intends to conduct a manual review of all electronic notes entries prior to production. Should Walgreens do so, automated redaction should still substantially reduce the number of entries for review and reduce the time spent reviewing each entry (whereby most PHI has already been redacted and just needs to be confirmed). A substantial number of records I observed contained only content that could be easily redacted on an automatic basis. Once such content is redacted (*e.g.*, an email address), there is nothing left in an entry to review.

Executed in Forest Hills, NY this 26th day of May, 2021.

A Marie

Digitally signed by Jonathan Jaffe DN: cn=Jonathan Jaffe, o=www.its-your-internet.com, ou, email=jjaffe@its-your-internet.com, c=US
Date: 2021.05.26 18:25:04 - 04'00'

Jonathan Jaffe

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26

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Attachment A

JONATHAN JAFFE

www.its-your-internet.com Forest Hills, New York 11375 (866) 526-1836 jjaffe@its-your-internet.com linkedin.com/in/jonathankjaffe

EXPERT TECHNOLOGY + LITIGATION ESI CONSULTING

ESI Technical Representative...Federal Expert Witness...ESI Discovery Consulting Database/Data Analysis...Statistical Sampling...Gap Analysis...ESI Forensics

<u>Its-Your-Internet</u> 2008-present

Its-Your-Internet is a bespoke general software and ESI litigation support consultancy. It was established in March 2008.

Founding Owner, 2008-present;

- Plaintiffs' Designated ESI Representative for Over 500 Firms on Multiple Mass Tort Litigations
 involving Product Liability with Medical Devices and Drugs (hundreds of thousands of individual
 plaintiffs collectively) extensive engagement from early discovery through trial
- Plaintiffs' Designated ESI Representative in Multiple Class Action Suits (many involving Fair Credit Reporting Act violations in consumer reporting)
- Plaintiffs' Designated ESI Representative in Attorney General Suits involving Product Liability
- Expert Witness in Federal Cases on ESI Issues
- Database Analysis (Consumer Reports, Adverse Event/Safety, Clinical Trial, Registry, Call Note, Sales and Marketing, Statistical Analysis)
- Assisting with Class List development and certification
- Working with Extremely Large Document Productions (100MM+ pages)
- Working with Extremely Large Database Productions and Extracts
- Analysis of Statistical Results from Clinical Studies
- Trial Support (exhibit list document selection and preparation, helping find documents used with adverse witnesses and in cross examination, translating finds into usable exhibits, demonstratives, jury charges)
- Plaintiff Document Production (Workflow, Redaction, Privilege Review, Staging and Producing)
- Built Bespoke Production Review Software
- Discovery Format and Production Negotiation
- Redaction / Privilege Review Management
- Keyword Search Term Recommendations, Predicative Coding Recommendations
- Custodial Production Forensics
- Custodial Production Storage Recommendations
- Drafting ESI Related Interrogatories, Requests for Production, Requests for Admission
- Deduplication, Gap Analysis, Statistical Sampling, Forensic Analysis, Discovery Issues Analysis
- Assisting Attorneys on 30(b)(6) Depositions, Meet and Confers, Hearings, Motions, Draft Orders,
 Stipulations, Rule 34 issues
- Supporting other Expert Witnesses
- Creating Supporting ESI Reports for Court Hearings
- Deposition Workup and Providing Deposition Assistance

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- Supervising and participating (design, coding, analysis) over a large variety of projects, most with significant teams, inclusive of:
 - o Litigation Support Custom Applications / Software / Data Analysis
 - Subscription Site for M&A Information, Oauth2 Authentication, Graph Analysis, and Internal Application Development for Investment Bank
 - o Real-time Chat Extension for Large VoIP Provider
 - Redesign of Class Action Support System for a Top 3 Legal Administrative Services Firm (Billions of Dollars of Administration)
 - o LMS and Exam SaaS applications for West African Market
 - o Mobile West Africa #1 App FindAMed
 - Subscription Based Site for Theater and Performing Arts Companies
 - School Based Management Systems Development
 - o Raffle Contest Site and Variations
 - Writing and Support for Core Remake of Multi-Million Page Web Site
 - SEO and SEM Management for Multiple Clients
 - Finalist in Multi-Billion \$ RFP for NYC DOE
 - > 50 original web sites inclusive of e-Commerce
 - o Countless consultations with Entrepreneurs
- Multiple Entrepreneurial Projects Using Bleeding Edge Technology
- Established a Dozen Key Reciprocal Partnerships
- > 30 Talks and Lectures on Technology and Social Media for Chambers of Commerce, SBA,
 Charities and Non-Profit, Business Groups and Organizations
- Day to Day Resource Management, Staffing, Administration
- Oversight of Remote and Offshore Resources
- Branding, Marketing, Materials (for Firm and Clients)

General Technologies: NoSQL, SQL, C#, PHP, NodeJS, Python, Django, NPM, PaaS, Heroku, HTML5, BackboneJS, EmberJS, AngularJS, MongoDB, Cloudant, Redis, MSSQL, Oracle, MySQL, MariaDB, Postgres SQL, ExpressJS, Git/GitHub, GruntJS, E2E Testing, ASP.NET MVC, ASP.NET, Cordova PhoneGap, Amazon Web Services (S3, CloudFront, EC2), Azure, XML, XML Schema, LESS, CSS3, SocketJS, Bower, Joomla, Drupal, WordPress, Office365, SharePoint, SalesForce, JIRA, Photoshop, Illustrator, GIMP, RESTful and Agile Methodologies, Quantum Computing (early exploration).

Legal Review Platforms: Relativity, Catalyst Insight, Everlaw, iConect-Xera, Eclipse, Disco, Crivella

Forensic Software: FTK Imager, Encase, Cellebrite PA UFED, Transend Migrator, Magnet IEF

Weitz & Luxenberg, P.C.

2002-2008

Weitz & Luxenberg is one of the nation's original and foremost firms in mass tort asbestos litigation handling nearly one million simultaneous pending court actions, 250,000 bankruptcy claims, and over 50 other personal injury litigations.

Jonathan Jaffe CV 2 | Page

Manager of Software Development, 2003-2008 Sr. Project Manager, 2002-2003

- Federal Expert Witness resulting in substantial eDiscovery Sanctions
- Collection of documents for litigation; Validation; Forensic Analysis
- Coordinated activities of 5 teams, comprising 20 resources
- Achievements included: establishing and overseeing the 4th largest personal injury law firm site, <u>www.weitzlux.com</u>, all internal development, sales/marketing efforts, public relations, and client services.
- Chief software architect.
- Increased site traffic 5,000% (to 12,000+ unique visitors/day) and original content by 2MM+ pages.
- Positioned web site as a new sales channel, netting \$MM in new revenue, 45,000% increase in leads to 1,500 new case leads/week.
- Gained first page ranking for 750,000+ search terms used to find the site including some of the most competitive (ex. *asbestos lawyer*).
- Reduced annual Internet marketing costs by \$3.6 million, or 96%, while increasing returns.
- Transformed internal development into a premier asset of the firm resulting in joint development efforts with Federal Express, 2 case studies on our use of Web Services by Microsoft, and the adoption of our proprietary document management technologies by other law firms across the country.
- Oversaw distribution of \$300 million/year in settlements to tens of thousands of clients.
- Increased overall internal system performance 500% with a 75% reduction in system downtime.
- Mentored technical team, developers, analysts, SEO (search engine optimization)

Technologies: C#. VB.NET, ASP.NET, SQL2005, SQL2000, OLTP, OLAP, JavaScript, HTML, Exchange2003, Win2003, IPSec, CISCO VPN, Citrix Presentation Server, Win2000, WinNT4, Project, PowerPoint, WebSense, eSafe, Active Directory (LDAP) Interface, XML, xHTML, Web Services, Visual Studio Team Foundation Server, VSS, VB6, Access, Microsoft Office, Cisco PIX (Firewall), Tape Library Backup, Document Management, CRM, ERP, Great Plains 7.0, Great Plains 6.0, Goldmine, ASP3.0, IIS 6.0, Windows Services, Snap NAS, LeadTools (Imaging), SharePoint, AscentCapture, Concordance, Summation, iConnect, ComponentOne for .NET, Flash, Mac OSX, Photoshop, SEO

Case Studies (Business + Technology):

http://download.microsoft.com/documents/customerevidence/27250_Weitz_Lux_Final_BA.doc

http://download.microsoft.com/documents/customerevidence/27249_Weitz_Lux_Final_CS.doc

<u>IMJ Group Inc.</u> 2001-2002

IMJ was a startup business/technology consulting think tank and solution implementation firm I started with two partners.

Vice President, Technology / Founding Partner

- Established corporate status for the firm and branding.
- Recruited and supervised staff.

Technologies: Linux, BSD, Java, Access, Microsoft Project, Microsoft PowerPoint, Microsoft Excel.

Jonathan Jaffe CV 3 | Page

Winstar Communications, Inc., Web Development Group

2000-2001

The Winstar Web Development Group was an Internet consultancy, part of Winstar (a dot-com telecommunications firm), specializing in large Intranets and Internet sites.

Acting Director of Technology, 2001; Senior Technology Architect, 2000-2001

Technical Leadership

- Directed a team of 17 project managers, developers, system engineers, and site designers.
- Managed full project lifecycle for six and seven digit budgets.
- Chief Software Architect.
- Designed Internet and Intranet sites, including Hosting Solutions.
- Established procedures and process, integrating what had been five company acquisitions into one team.
- Mentored development team.

Business Development

- Increased average project value 10,000% (from \$50,000) to \$5 million, including winning the team's first \$1 million contract.
- Liaised successfully with other Winstar divisions (Hosting, Office.com, Professional Services, and Winstar for Buildings) resulting in improved sales and project coordination.
- Led Winstar team on a \$50 million proposal for the NYC Board of Education with partners Sun, Oracle, Lucent, Microsoft and Compaq.

Technologies: ASP 3.0, SQL2000, SQL 7.0, JavaScript, HTML, Project, PowerPoint, VSS, Exchange2000, Win2000, WinNT4, WebSense, Active Directory, VB6, VB5, Visio, Microsoft Office, Flash, Photoshop, QuarkXpress.

Example web site: http://www.nationalmssociety.org still largely uses the same information architecture laid out over 18 years ago.

Valinor, Inc. 1995-2000

Valinor Inc., a wholly owned subsidiary of IKON Office Solutions, was the original Microsoft Solutions Partner/Provider & Authorized Technical Education Center in New York City, consulting for Fortune 500 firms.

Technical Project Manager / Microsoft Certified Trainer, 1998-2000 (after graduating Columbia);

Technical Project Leader / Senior Technical Architect, 1996-1998 (while attending Columbia full time 20+ hrs/wk);

Senior Application Developer / Application Developer, 1995-1996 (while attending Columbia full time, 20+ hrs/wk)

Jonathan Jaffe CV 4 | Page

General Achievements

- Increased average project value, formerly \$100,000 average, 500% to \$500,000
- Led teams of up to 10 developers

Valinor Key Consulting Projects

- AIG/AIU NAD migration of AIG Europe's mainframe-based quotation and policy generation system to Microsoft Windows/Office workstation platforms, reducing the time to policy from days to minutes.
- **Berkery, Noyes & Co.** a company-wide line of business application matching companies seeking to sell themselves with potential buyers.
- **The College Board** Internet application to gather annual survey data for all United States accredited colleges and universities.
- **DLJ** on site training.
- **Garban Intercapital** a cash derivatives trading system utilized by 60 brokers.
- **IKON Office Solutions** reconciled revenue reporting data from multiple disparate databases.
- Matsushita workflow support ticketing system.
- Maersk Shipping reconciled multiple shipping databases.
- Merrill Lynch on site training on active trading floors.
- NYC Department of Technology on site training.
- **Sumitomo Mitsui** application to monitor, track and handle all transactions and interest calculations for a multi-billion per year transfer of high risk loans.
- **Sun Chemical** on site training and follow up consulting.
- **Yankee Copyrights Management** a large eCommerce application for a startup to create a marketplace for permissions to use and replicate copyrighted materials.

Technologies: ASP2.0. SQL7.0, SQL6.0, Sybase, Oracle, MTS, COM, JavaScript, HTML, Project, Powerpoint, VSS, Exchange5, WinNT4, WinNT3.51, Unix-Solaris, C++, MFC, VB6, VB5, VB4, VB3, Access, Visio, Goldmine, Microsoft Word, Excel

ADJUNCT PROFESSOR

Columbia University School of Continuing Education, evening classes

2003-2005

- Taught Database Design/Advanced SQL, and .NET Programming courses QC7304, QC7305, QC7403.
- Developed curriculum for courses, part of SASE track certificate program.

EDUCATION

Bachelor of Arts, Economics/Mathematics, Magna cum Laude 3.72 GPA, Columbia University, 1999 Stuyvesant High School, 1995

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CERTIFICATIONS

Microsoft Certified Professional, 1998 Microsoft Certified Trainer, 1998

MAJOR LAW FIRMS

LANIER LAW FIRM
BARON BUDD
SIMMONS HANLY CONROY
SEEGER WEISS
WEITZ & LUXENBERG
BERGER MONTAGUE
MAZIE SLATER KATZ & FREEMAN
BAILEY PEAVY BAILEY
KAISER GORNICK

SANDERS VIENER GROSSMAN

SALIM BEASLEY

CRONIN FRIED

NEBLETT, BEARD & ARSENAULT

BLASINGAME BURCH GARRARD ASHLEY

NICHOLS KASTER

PODHURST ORSECK

KIRTLAND & PACKARD

AYLSTOCK, WITKIN, KREIS & OVERHOLTZ

BEASLEY ALLEN

KAZAN, MCCLAIN, SATTERLEY & GREENWOOD NAPOLI SHKOLNIK

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EXPERT TESTIMONY

Hearings

2015

IN RE BENICAR (OLMESARTAN) PRODUCTS LIABILITY LITIGATION.

UNITED STATES DISTRICT COURT NEW JERSEY, CAMDEN VICINAGE

No. 1:15-md-02606

2010

IN RE: GADOLINIUM BASED CONTRAST AGENTS LITIGATION.

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO, EASTERN DIVISION

No. 1:08-GD-50000, MDL NO. 1909

2007

In re SEROQUEL PRODUCTS LIABILITY LITIGATION.

UNITED STATES DISTRICT COURT MIDDLE DISTRICT FLORIDA, ORLANDO DIVISION

No. 6:06-md-1769-Orl-22DAB.

Depositions

2019

RALPH GAMBLES, THOMAS MERCK, AND ELISE COMPO v. STERLING INFO SYSTEMS UNITED STATES DISTRICT COURT NEW YORK, SOUTHERN DISTRICT 1:15-cv-09746-PAE

2019

SCOTT RILLEY, MICHELLE KUNZA, VENUS COLQUITT-MONTGOMERY, JONATHON ALDRICH, AND KENDRA BUETTNER v. MONEYMUTUAL, LLC, SELLING SOURCE, LLC, AND PARTNERWEEKLY, LLC

UNITED STATES DISTRICT COURT MINNESOTA

No. 16-cv-4001 (DWF/LIB)

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2015

PHILADELPHIA COUNTY COURT OF COMMON PLEAS

Nos. 01144, 0402, 3694, 3678, 3672, 3758, 3686, 3727, 0489

2015

JOSEPH JAUHOLA VS. CANADIAN NATIONAL RAILWAY COMPANY, AND WISCONSIN CENTRAL, LTD. UNITED STATES DISTRICT COURT MINNESOTA

No. 14-cv-1433

2007

In re SEROQUEL PRODUCTS LIABILITY LITIGATION.

UNITED STATES DISTRICT COURT MIDDLE DISTRICT FLORIDA, ORLANDO DIVISION

No. 6:06-md-1769-Orl-22DAB.

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SPEAKING ENGAGEMENTS

Chambers of Commerce

- Greater NY Chamber of Commerce
- Forest Hills Chamber of Commerce
- Franklin Square Chamber of Commerce
- Medford Chamber of Commerce
- Rockville Centre Chamber of Commerce
- Oceanside Chamber of Commerce
- BRiSC the Unofficial Silicon Alley Chamber of Commerce

Small Business Administration

- USSBA (March 2010)
- USSBA (April 2010)
- USSBA (May 2010)

Business Groups and Organizations

- Independent Business Women's Group
- Associated Builders & Contractors Lower NY State
- Associated Builders & Contractors Nassau/Suffolk
- East End Women's Network

Charities and Non-Profits

- Northport Rotary
- Kiwanis International

Continuing Education

- Columbia University School of Continuing Education adjunct professor
- Locust Valley Adult Education
- College of New Rochelle Graduate Program
- Monroe College Graduate Program

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